

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENVILLE

SNMP RESEARCH, INC. and SNMP
RESEARCH INTERNATIONAL, INC.,

Plaintiffs,
v.

BROADCOM INC.; BROCADE
COMMUNICATIONS SYSTEMS LLC; and
EXTREME NETWORKS, INC.

Defendants.

Case No. 3:20-cv-00451

DECLARATION OF JOHN RONDONI

I, JOHN RONDONI, declare as follows:

1. I am the Senior Vice President and General Manager of Storage Networking at Brocade Communications Systems LLC (“Brocade”). I make this declaration in support of Broadcom Inc.’s and Brocade’s Motion to Dismiss Plaintiffs’ Complaint or, Alternatively, to Transfer Venue. I make this declaration based on personal knowledge of the facts stated herein, as well as a review of Brocade’s business records. If called as a witness in this action, I would testify to the following facts.

2. Brocade has its headquarters in San Jose, California. It would therefore be far more convenient for Brocade to litigate this matter in the Northern District of California.

3. The witnesses with knowledge relevant to Plaintiffs’ claims are current and former employees of Brocade who live in or around San Jose, California. Current employees include without limitation myself, Martin Skagen, and Vamsi Balimidi. Several individuals who were employed by Brocade prior to the divestiture to Extreme are no longer employed by Brocade.

Former employees who reside in California who may have relevant information include without limitation the signatories listed on the License Agreement and amendments thereto attached to the Complaint, including without limitation Zahid Hussain. Other former employees who reside in California and who may have relevant information include those listed on the consent to assignment notice referenced in the Complaint, including without limitation Larry Fitterer.

4. Evidence relevant to this case is also located in San Jose, California, including documents relating to Brocade's divestiture to Extreme, Brocade's products, and Brocade's use of software licensed by SNMP Research International, Inc.

5. The events at the heart of this case occurred in California. These events include the divestiture of Brocade's data center operations to Extreme Networks, Inc., discussions relating to the divestiture, and Brocade's use of software licensed by SNMP Research International, Inc.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22nd day of December, 2020, at San Jose, California.



John Rondoni